

Attachment I

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California Native Plant Society

Monterey Bay Chapter, P.O. Box 221303, Carmel, CA 93922

October 10, 2018

VIA EMAIL TO: Mike X5176 Novo <novom@co.monterey.ca.us>; Wendy X5430 Strimling <strimlingw@co.monterey.ca.us>

Cc: Jacqueline X5193 Onciano <oncianoj@co.monterey.ca.us>; Brandon Xx5334 Swanson <swansonb@co.monterey.ca.us>; Carl P. X5103 Holm <holmcp@co.monterey.ca.us>; Yolanda Maciel Pantoja <macielpantojay@co.monterey.ca.us>; Melissa X5146 McDougal <mcdougalm@co.monterey.ca.us>; Kevin Kahn <kevin.kahn@coastal.ca.gov>; Michael Watson <michael.watson@coastal.ca.gov>; "katie.butler@coastal.ca.gov" <katie.butler@coastal.ca.gov>; Dan Carl <dan.carl@coastal.ca.gov>

Mike Novo, Zoning Administrator
168 W. Alisal Street
Salinas, CA 93901

SUBJECT: Meeting October 11, 2018, Agenda Item ZA 18-065, PLN 160131, PG&E Powerline Maintenance

Dear Mr. Novo:

It has come to the attention of the Monterey Bay Chapter of the California Native Plant Society that a Mitigated Negative Declaration has been prepared for a grading and vegetation removal project proposed in an area of Environmentally Sensitive Habitat in North Monterey County. The work proposed consists of grading on slopes in excess of 25% and the removal of special status plants for PG&E powerline maintenance on Assessor's Parcels 129-281-017, 129,281,007, 008 and 009.

The Monterey Bay Chapter of CNPS obtained the Initial Study and Staff Report for this project, however we were not able to review the 2016 Biological Report prepared by Arcadis U.S., Inc. As outlined in the Initial Study, the proposed mitigation to offset damage to Environmentally Sensitive Habitat Area, notably Central Maritime Chaparral and several special status plant species, seems inadequate for a project that involves substantial grading and vegetation removal in this rare natural community.

Sandy substrates in this region are notoriously erosive and mitigation must include soil stabilization measures that are monitored for an adequate amount of time. No proposed mitigation in the Initial Study addresses the issue of erosive soil stabilization.

The Initial Study includes a proposed mitigation for impacts to Biological Resources that mentions stockpiling topsoil and then replacing it and seeding with a "local native seed stock". What type of seed mix is recommended and how will germination and success criteria be maintained? Any sort of seed introduced into Central Maritime Chaparral ESHA must be carefully considered and sourced to maintain habitat integrity.

The Initial Study includes a proposed mitigation for impacts to Biological Resources that mentions salvaging 20 special status plants and replanting them. The success of transplanting shrubs found in rare Central Maritime Chaparral has not been documented. This mitigation measure is inappropriate and inadequate. Who will maintain the planting stock and what are the success criteria parameters? The 3 shrub species mentioned in the Initial Study include Parajo manzanita, Hooker's manzanita and Eastwood's goldenbush. These species are truly uncommon, and in particular, Eastwood's goldenbush (*Ericameria fasciculata*), is a CNPS Rank 1B.1 plant, indicating it is extremely rare and restricted in distribution. The ESHA habitat that supports these special status plant species should be avoided.

Please reconsider the proposed mitigations described in the Initial Study - they will not reduce Biological Impacts to Less Than Significant in the ESHA impacted by this project.

Sincerely,

s/s Nicole Nedeff

Nicole Nedeff
President



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California Native Plant Society

MONTEREY BAY CHAPTER, P.O. Box 221303, Carmel, CA 93922

November 4, 2018

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Mike Novo, Zoning Administrator
Monterey County Resource Management Agency
168 W. Alisal Street
Salinas, CA 93901

SUBJECT: PLN 160131, PG&E Powerline Maintenance, North Monterey County Coastal Zone

Dear Mr. Novo:

Thank you, and your colleague Brandon Swanson, for posting the Biological Assessment for this project on the County's document sharing site. The proposed project is a grading and vegetation removal effort in an area of Environmentally Sensitive Habitat in North Monterey County. The work proposed consists of grading on erosive slopes in excess of 25% and involves the removal of special status plants and Central Maritime Chaparral for PG&E powerline maintenance. Assessor's Parcels 129-281-017, 129,281,007, 008 and 009, in the Moss Landing Area are impacted by the proposed project.

The comments CNPS - Monterey Bay Chapter submitted prior to the Zoning Administrator Hearing on October 11, 2018, reflected our review of the Initial Study without the benefit of access to the Biological Assessment for this project. After reviewing the County Staff Report and the Biological Assessment prepared by Arcadis in 2016, CNPS still has major concerns regarding potential impacts to special status plants and Environmentally Sensitive Habitat. The Chapter also has major concerns about the adequacy of the Biological Assessment and environmental review that the County is relying on to forward this project through the County's permitting process.



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The Biological Assessment fails to include items that are fundamental to thorough environmental review and mitigation of potential impacts to biologically sensitive resources. The Biological Assessment does not include the whole of the project, the whole of the impacts, adequate mitigation measures, a habitat restoration plan, success criteria for restoration, or monitoring parameters to confirm mitigation success. Each of these items are typically required by the Monterey County Resource Management Agency for environmentally sensitive habitat loss and grading in extremely erosive soil, particularly in the Coastal Zone where this proposed grading and vegetation removal project will occur.

It remains unclear what impacts are anticipated in the 6,880 square-foot LOD (Limit of Disturbance) and what restoration is proposed to remediate environmental damage when the project is complete. The Biological Assessment looks only at the small sub-site and not at the larger Limit of Disturbance. Topsoil will be salvaged and replaced over the grading footprint, however does this pertain to the entire LOD, or only the location of slope reconfiguration?

What revegetation is proposed and how will it be maintained throughout the entire LOD after heavy equipment is maneuvered and stored, soil is exposed and stockpiled, and vegetation is either removed or damaged? The impacts associated with these components of the project have not yet been disclosed. Until the County has investigated and addressed these impacts as part of an amended biological assessment it would be premature for the County to propose and adopt mitigation measures.

As CNPS previously noted, the proposed mitigation includes salvaging 20 extremely uncommon special status plants and replanting them (the Biological Report notes, "if feasible"). However, the long-term success of transplanting shrubs found in rare Central Maritime Chaparral has not been documented. What mitigation will occur if the salvage and transplanting of rare plants is deemed "not feasible", and how will the long-term viability of transplanted shrubs be documented if this proposed mitigation is determined to be "feasible"?

Will there be mitigation for the loss of 10 coast live oak seedlings and will the removal of weedy invasive plants like pampas grass, eucalyptus and French broom be required as a component of the restoration of the project site? The Biological Assessment prepared by Arcadis notes that these weedy invasive species occur in the project vicinity, however management of non-native weeds is not addressed. This is an important issue due to its impact on native habitats, and the County should act to condition discretionary applications to address it.

Please elaborate on whether the mitigation plan has been amended in any way and whether a proper restoration plan has been developed. Any restoration plan proposed for the remediation of damage to environmentally sensitive habitat in the Coastal Zone should also incorporate success criteria and a monitoring time-line before the project moves forward in the County permitting process. Fundamental to the adequate environmental review of this project is identifying who will be responsible for the mitigation, restoration and monitoring - will this be completed by PG&E, or will this responsibility be encumbering the land owners where the utility right-of-way occurs?

CNPS asks that the biological assessment be revised to include the missing information and that the initial study be recirculated. The addition of the discussion of impacts to the entire LOD is a significant and material change to the Biological Assessment, and CNPS-Monterey Bay asks for time to review the information and any proposed mitigations.

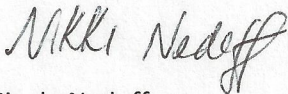
CNPS would appreciate being informed of the progress being made towards preparing a thorough and biologically defensible environmental review of this project as the permit application navigates through the County process.

Please include the Monterey Bay Chapter of CNPS on any notices and updates regarding this project, including notices that are required to be provided under Public Resources Code section 21092.2. Thank you for addressing correspondence and future communication directly to nikki@ventanaview.net.

Finally, CNPS asked the County to ensure there are consistent standards regarding evaluation of impacts and mitigations in sensitive habitat areas. CNPS would be interested in assisting the County in developing these written standards. If the County has already adopted standards on the preparation of Biological Assessments, please forward those to the Monterey Bay Chapter of CNPS.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Nikki Nedeff".

Nicole Nedeff
President

cc: Board of Directors, Monterey Bay Chapter, CNPS